

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

ADAM GRAD, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

IRONNET, INC., KEITH B. ALEXANDER,
JAMES C. GERBER, and WILLIAM E.
WELCH,

Defendants.

CASE No.: 1:22-cv-00449-RDA-JFA

**NOTICE OF MOTION OF XIAO PING
DIANA DAI TO: (1) APPOINT LEAD
PLAINTIFF; AND (2) APPROVE LEAD
PLAINTIFF'S SELECTION OF
COUNSEL**

CLASS ACTION

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Movant Xiao Ping Diana Dai ("Movant") hereby moves this Court, the Honorable Rossie D. Alston, Jr., United States District Court Judge, for an order:

- (a) appointing Movant to serve as Lead Plaintiff in this action; and
- (b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel and The Law Firm of Carlton F. Bennett, P.L.L.C. as Liaison Counsel for the Class.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated June 21, 2022; (ii) the Declaration of Carlton F. Bennett, and exhibits attached hereto; and (iii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

This motion is made on the grounds that Movant believes that she is the “most adequate plaintiff” pursuant to the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, Movant believes that she has the “largest financial interest” in the relief sought by the Class in the Action as a result of the substantial loss she suffered on her purchases of IronNet securities during the Class Period. Movant also believes that she otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because her claims are typical of those of other Class members and because she will fairly and adequately represent the interests of the Class.

Local Rule 7(E) requires setting a return date and a conference of counsel prior to filing motions. Due to the Private Securities Litigation Reform Act of 1995’s lead plaintiff procedure, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. Under these circumstances, Movant respectfully requests that the return date and conferral requirements of Local Rule 7(E) be waived.

Dated: June 21, 2022

Respectfully submitted,

**THE LAW FIRM OF CARLTON F.
BENNETT, P.L.L.C.**

/s/ Carlton F. Bennett

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*[Proposed] Liaison Counsel for Lead Plaintiff and
Class*

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*[Proposed] Lead Counsel for Lead Plaintiff
and Class*

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Carlton F. Bennett